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8 UNITED STATES DISTRICT
9 FOR THE EASTERN DISTRICT OF WASHINGTON

10 UNITED STATES OF AMERICA,

4:15-CR-6049-EFS

11 Plaintiff,

12 vs.
13 SECOND SUPERSEDING
14 INDICTMENT

15 JESE DAVID CARILLO CASILLAS,
16 ROSA ARACELI GRANADOS (a.k.a. La
17 China),
18 [REDACTED],
19 FRANCISCO DUARTE FIGUEROA,
20 GABRIELA MENDOZA VASQUEZ,
21 [REDACTED],
22 SALVADOR GUDINO CHAVEZ,
23 [REDACTED]
24 [REDACTED],
25 ERICA MARIA SOLIS,
26 EDGAR OMAR HERRERA FARIAS,
27 (a.k.a. Burro),
28 [REDACTED]

Vio: 21 U.S.C. § 846
Conspiracy to Distribute 500
Grams or More of a Mixture or
Substance Containing a
Detectable Amount of
Methamphetamine, 5 Kilograms
or More of Cocaine, 1 Kilogram
or More of Heroin and 400 grams
or More of N-phenyl-N
Propanamide
(Count 1)

Vio: 18 U.S.C. § 1956(h)
Conspiracy to Commit Money
Laundering (Count 2)

Vio: 21 U.S.C. § 841(a)(1),
(b)(1)(A)(ii)
Possession with the Intent to
Distribute 5 Kilograms or more of
Cocaine (Count 3)

SECOND SUPERSEDING INDICTMENT - 1

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1 [REDACTED]
2 [REDACTED]
3 JUAN BRAVO ZAMBRANO,
4 [REDACTED],
5 [REDACTED],
6 JOSE ADRIAN MENDOZA, [REDACTED]
7 [REDACTED],

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9 Defendants.
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Vio: 18 U.S.C. § 1956(a)(1)(B)(i)
Money Laundering
(Counts 4, 5, 6, 7, 10, 11, 12, 14)

Vio: 21 U.S.C. § 841(a)(1),
(b)(1)(A)(viii)
Possession with the Intent to
Distribute 50 grams or more of
Actual Methamphetamine
(Count 8)

Vio: 18 U.S.C. 1956(a)(1)(B)(i)
International Money Laundering
(Counts 9, 13)

Vio: 21 U.S.C. § 841(a)(1),
(b)(1)(A)(i), (vi)
Possession with the Intent to
Distribute 1 Kilogram or More of
a Mixture or Substance
Containing Heroin and
400 grams or More of a Mixture
or Substance Containing N-
phenyl-N Propanamide
(Count 15)

Notice of Criminal Forfeiture
Allegations

The Grand Jury Charges:

COUNT ONE

Beginning on a date unknown but by on or about January 2010 continuing until on or about December 6, 2016, in the Eastern District of Washington and elsewhere, the Defendants, JESE DAVID CARILLO CASILLAS, ROSA

SECOND SUPERSEDING INDICTMENT - 2

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1 ARACELI GRANADOS (a.k.a. La China), [REDACTED]
2 [REDACTED], FRANCISCO DUARTE
3 FIGUEROA, GABRIELA MENDOZA VASQUEZ, [REDACTED]
4 [REDACTED], SALVADOR GUDINO
5 CHAVEZ, [REDACTED], ERICA
6 MARIA SOLIS, EDGAR OMAR HERRERA FARIAS (a.k.a. Burro), [REDACTED]
7 [REDACTED]
8 JUAN BRAVO ZAMBRANO, [REDACTED]
9 [REDACTED]
10 [REDACTED], JOSE ADRIAN MENDOZA, [REDACTED],

11 did knowingly and intentionally combine, conspire, confederate and agree together
12 with each other and other persons, both known and unknown to the Grand Jury, to
13 commit the following offense against the United States, to wit: distribution of 500
14 grams or more of a mixture or substance containing a detectable amount of
15 Methamphetamine, 5 kilograms or more of a mixture or substance containing a
16 detectable amount of Cocaine, 1 kilograms or more of a mixture or substance
17 containing a detectable amount of heroin and 400 grams or more of a mixture or
18 substance containing a detectable amount of N-phenyl-N Propanamide, all
19 Schedule II controlled substances, in violation of 21 U.S.C. § 841(a)(1),
20 (b)(1)(A)(i), (ii)(I), (vi), and (viii); all in violation of 21 U.S.C. § 846.

21 SECOND SUPERSEDING INDICTMENT – 3

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COUNT TWO

Beginning on a date unknown but by on or about January 2010 continuing until present time, in the Eastern District of Washington and elsewhere, the Defendants, JESE DAVID CARILLO CASILLAS, GABRIELA MENDOZA VASQUEZ, [REDACTED]

[REDACTED], SALVADOR GUDINO CHAVEZ,
[REDACTED], and
others known and unknown, unlawfully and knowingly combined, conspired,
confederated and agreed together and with each other to commit certain money
laundering offenses under 18 U.S.C. § 1956, as follows:

(1956(a)(1))

The Defendants named in this count: did conduct and attempt to conduct financial transactions, that is: transactions involving the movement of funds by wire and other means affecting interstate and foreign commerce, and transactions involving the use of a financial institution which is engaged in and affects interstate and foreign commerce, which in fact involved the proceeds of specified unlawful activity, that is, conspiracy to distribute controlled substances, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846, knowing that the property involved in the financial transactions represents the proceeds of some form of unlawful activity, knowing that the transactions are designed in whole or in part to

1 conceal and disguise the nature, the location, the source, the ownership, and the
2 control of the proceeds of the specified unlawful activity, in violation of 18 U.S.C.
3 § 1956(a)(1)(B)(i); and

5 **(1956(a)(2))**
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7 The Defendants named in this count: did transport, transmit, and transfer,
8 and attempt to transport, transmit, and transfer a monetary instrument and funds
9 from a place in the United States to and through a place outside the United States
10 with the intent to promote the carrying on of specified unlawful activity, that is,
11 conspiracy to distribute controlled substances, in violation of 21 U.S.C. §§
12 841(a)(1), (b)(1)(A), and 846; in violation of 18 U.S.C. § 1956(a)(2)(A).
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14 The Grand Jury further alleges this offense was committed during and in
15 furtherance of the conspiracy charged in Count One, above.
16

17 All in violation of 18 U.S.C. § 1956(h).
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20 **COUNT THREE**
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22 On or about August 20, 2014, in the Eastern District of Washington, the
23 Defendant, ERICA MARIA SOLIS, did knowingly and intentionally possess with
24 intent to distribute 5 kilograms or more of mixture or substance containing a
25 detectable amount of cocaine, a schedule II controlled substance, in violation of 21
26 U.S.C. § 841(a)(1), (b)(1)(A)(ii), and 18 U.S.C. § 2.
27

COUNT FOUR

On or about April 22, 2015, and continuing until on or about April 27, 2015, in the Eastern District of Washington and elsewhere, the Defendant, JESE DAVID CARILLO CASILLAS, did conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit: a money wire transfer of US currency to a Wells Fargo account in the name of JESE CASILLAS located in Kennewick, Washington; which involved the proceeds of a specified unlawful activity, that is conspiracy to distribute and the distribution of controlled substances, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is funds in the amount of \$8000 represented the proceeds of some form of unlawful activity in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i), and 2.

COUNT FIVE

On or about November 24, 2015, and continuing until on or about December 14, 2015, in the Eastern District of Washington and elsewhere, the Defendant, JESE DAVID CARILLO CASILLAS, did conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit: a money

wire transfer of U.S. currency to a Wells Fargo account in the name of JESE CASILLAS located in Kennewick, Washington; which involved the proceeds of a specified unlawful activity, that is conspiracy to distribute and the distribution of controlled substances, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is funds in the amount of \$5,000 represented the proceeds of some form of unlawful activity in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i), and 2.

COUNT SIX

On or about December 2, 2015, and continuing until on or about December 5, 2015, in the Eastern District of Washington and elsewhere, the Defendant, GABRIELA MENDOZA VASQUEZ, did conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit: a money wire transfer of U.S. currency to a Bank of America account in the name of Gabriela Mendoza located in Pasco, Washington; which involved the proceeds of a specified unlawful activity, that is conspiracy to distribute and the distribution of controlled substances, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846,

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1 knowing that the transaction was designed in whole or in part to conceal and
2 disguise the nature, the location, the source, the ownership, and the control of the
3 proceeds of the specified unlawful activity, and that while conducting and
4 attempting to conduct such financial transaction knew that the property involved in
5 the financial transaction, that is funds in the amount of \$6,000 represented the
6 proceeds of some form of unlawful activity in violation of 18 U.S.C. §§
7 1956(a)(1)(B)(i), and 2.
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10 **COUNT SEVEN**

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12 On or about December 2, 2015, and continuing until on or about December
13 8, 2015, in the Eastern District of Washington and elsewhere, the Defendant, JESE
14 DAVID CARILLO CASILLAS, did conduct and attempt to conduct a financial
15 transaction affecting interstate and foreign commerce, to wit: a money wire
16 transfer of U.S. currency to a Wells Fargo account in the name of Jese Casillas
17 located in Kennewick, Washington; which involved the proceeds of a specified
18 unlawful activity, that is conspiracy to distribute and the distribution of controlled
19 substances, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846, knowing
20 that the transaction was designed in whole or in part to conceal and disguise the
21 nature, the location, the source, the ownership, and the control of the proceeds of
22 the specified unlawful activity, and that while conducting and attempting to
23 conduct such financial transaction knew that the property involved in the financial
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28 **SECOND SUPERSEDING INDICTMENT – 8**

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1 transaction, that is funds in the amount of \$1,689.14 represented the proceeds of
2 some form of unlawful activity in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i), and
3
4 2.

5 **COUNT EIGHT**
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7 On or about January 6, 2016, in the Eastern District of Washington, the
8 Defendants, JESE DAVID CARILLO CASILLAS and [REDACTED]
9 [REDACTED], did knowingly and intentionally possess with intent to distribute 50
10 grams or more of actual Methamphetamine, a Schedule II controlled substance, in
11 violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(viii), and 18 U.S.C. § 2.
12
13

14 **COUNT NINE**
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16 On or about March 1, 2016, and continuing until on or about March 14,
17 2016, in the Eastern District of Washington and elsewhere, the Defendant, JESE
18 DAVID CARILLO CASILLAS, did transport, transmit, and transfer, and attempt
20 to transport, transmit, and transfer monetary funds, that is \$46,950 in Canadian
21 Currency, from a place outside the United States that is Surrey, British Columbia
22 Canada, to and through a place inside the United States, to wit: US currency wired
24 to various accounts in the United States to include \$5,000 wired to a JP Morgan
25 Chase account located in Kennewick, Washington, in the name of Daisy Camacho,
26 with the intent to promote the carrying on of specified unlawful activity, that is,
27 conspiracy to distribute and distribution of controlled substances, in violation of
28
SECOND SUPERSEDING INDICTMENT – 9

1 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846, in violation of 18 U.S.C. §§
2 1956(a)(2)(A), and 2.

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4 **COUNT TEN**

5 On or about April 7, 2016, until or about April 13, 2016, in the Eastern
6 District of Washington and elsewhere, the Defendant, JESE DAVID CARILLO
7 CASILLAS, did conduct and attempt to conduct a financial transaction affecting
8 interstate and foreign commerce, to wit: the transfer, delivery and other disposition
9 of \$244,350.00 in U.S. funds from and at the direction of JESE DAVID
10 CARILLLO CASILLAS to [REDACTED]; which involved the
11 proceeds of a specified unlawful activity, that is conspiracy to distribute and the
12 distribution of controlled substances, in violation of 21 U.S.C. §§ 841(a)(1),
13 (b)(1)(A), and 846, knowing that the transaction was designed in whole or in part
14 to conceal and disguise the nature, the location, the source, the ownership, and the
15 control of the proceeds of the specified unlawful activity, and that while
16 conducting and attempting to conduct such financial transaction knew that the
17 property involved in the financial transaction, that is funds in the amount of
18 \$244,350.00 represented the proceeds of some form of unlawful activity in
19 violation of 18 U.S.C. §§ 1956(a)(1)(B)(i), and 2.

COUNT ELEVEN

On or about May 17, 2016 and continuing until on or about May 18, 2016, in the Eastern District of Washington and elsewhere, the Defendant, JESE DAVID CARILLO CASILLAS, did conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit: a money wire transfer of U.S. funds to a Wells Fargo account in the name of [REDACTED] located Kennewick, Washington; which involved the proceeds of a specified unlawful activity, that is conspiracy to distribute and the distribution of controlled substances, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is funds in the amount of \$3,000 represented the proceeds of some form of unlawful activity in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i), and 2.

COUNT TWELVE

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A horizontal bar chart with 14 categories, each represented by a black bar. The categories are labeled vertically on the left side from 1 at the top to 14 at the bottom. Category 1 has the longest bar, followed by category 8. Categories 3, 6, and 13 have the shortest bars.

| Category | Value (approximate) |
|----------|---------------------|
| 1 | 9.5 |
| 2 | 9.8 |
| 3 | 1.5 |
| 4 | 8.5 |
| 5 | 9.5 |
| 6 | 1.5 |
| 7 | 9.5 |
| 8 | 9.8 |
| 9 | 1.5 |
| 10 | 9.5 |
| 11 | 9.8 |
| 12 | 9.5 |
| 13 | 1.5 |
| 14 | 9.5 |

COUNT THIRTEEN

On or about May 26, 2016, and continuing until on or about June 3, 2016, in
the Eastern District of Washington and elsewhere, the Defendant, JESE DAVID
CARILLO CASILLAS, did transport, transmit, and transfer, and attempt to
transport, transmit, and transfer monetary funds, that is \$225,070 in Canadian
Currency, from a place outside the United States that is Surrey, British Columbia,
Canada, to and through a place inside the United States, to wit: U.S. currency
deposited and withdrawn in various accounts in the United States to include a
Wells Fargo Account located in Kennewick, Washington, in the name of [REDACTED]

[REDACTED] with the intent to promote the carrying on of specified unlawful activity,
SECOND SUPERSEDING INDICTMENT - 12

1 that is, conspiracy to distribute and distribution of controlled substances, in
2 violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846, in violation of Title 18
3 U.S.C. §§ 1956(a)(2)(A), and 2.

5
6 **COUNT FOURTEEN**
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27
28

COUNT FIFTEEN

On or about August 15, 2016, in the Eastern District of Washington, the Defendants, JESE DAVID CARILLO CASILLAS, FRANCISCO DUARTE FIGUEROA and [REDACTED], did knowingly and intentionally possess with intent to distribute approximately 10 kilograms of a substance which contained 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N Propanamide and 1 kilogram or more of a mixture or substance containing a detectable amount of Heroin, Schedule II controlled substances, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(i), (vi) and 18 U.S.C. § 2.

NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 21 U.S.C. § 853, upon conviction of an offense of violation of
21 U.S.C. § 846, JESE DAVID CARILLO CASILLAS, ROSA ARACELI
GRANADOS (a.k.a. La China), [REDACTED] UEL
[REDACTED], FRANCISCO DUARTE FIGUEROA,
GABRIELA MENDOZA VASQUEZ, [REDACTED],
[REDACTED]

1 SALVADOR GUDINO CHAVEZ, [REDACTED],
2 [REDACTED]
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4 ERICA MARIA SOLIS, EDGAR OMAR HERRERA FARIAS (a.k.a. Burro),
5 [REDACTED]
6 [REDACTED]
7 JUAN BRAVO ZAMBRANO, [REDACTED]

8 [REDACTED], JOSE ADRIAN
9 MENDOZA, [REDACTED], and, shall forfeit to the United
10 States of America, any property constituting, or derived from, any proceeds
11 obtained, directly or indirectly, as the result of such offense(s) and any property
12 used or intended to be used, in any manner or part, to commit or to facilitate the
13 commission of the offense(s).
14

15 If any forfeitable property, as a result of any act or omission of the
16 Defendants:

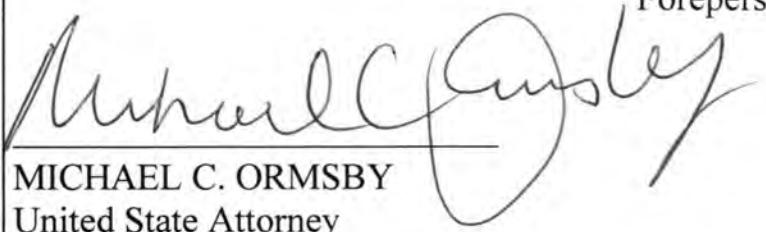
- 17 (a) cannot be located upon the exercise of due diligence;
18 (b) has been transferred or sold to, or deposited with, a third party;
19 (c) has been placed beyond the jurisdiction of the court;
20 (d) has been substantially diminished in value; or
21 (e) has been commingled with other property which cannot be divided
22 without difficulty;

1 the United States of America shall be entitled to forfeiture of substitute property
2 pursuant to 21 U.S.C. § 853(p).
3

4 DATED this [REDACTED] day of December 2016.
5

6 A TRUE BILL
7

8 [REDACTED]
9 Foreperson

10 
11 MICHAEL C. ORMSBY
12 United State Attorney
13

14 
15 Stephanie A. Van Marter
16 Assistant United States Attorney
17